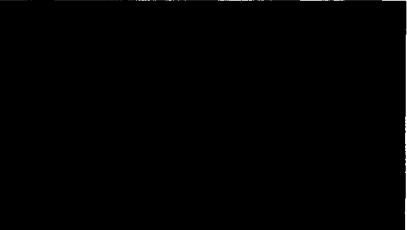


**Requirement: Manage the central office code resource in accordance with published INC guidelines which may be modified by the appropriate regulatory action or statute.**

As the new NANPA, we will manage and administer CO codes in accordance with INC Guidelines (INC 95-0407-008). We will proactively adjust our procedures when INC guidelines are changed or refined by ICCF/INC or by regulatory action or statute.

**Requirement: Develop a working relationship with local regulators and considerable knowledge of local/regional environments.**

As the new NANPA, we will continue to develop working relationships with local regulators to advance our knowledge concerning local/regional environments.



This knowledge will include the local geography, demographics, growth patterns, and local dialing plan so we can properly and effectively perform our responsibilities when assigning new CO codes or developing relief options for NPAs in, or close to, jeopardy.



## **5.2 Central Office Code Administration Functional Requirements**

### **5.2.1 General Client Services**

A very important activity of any service organization is to professionally and quickly respond to all customer contacts, providing timely and accurate information. [REDACTED]

[REDACTED] We will develop an analogous set of performance standards for NANPA operations [REDACTED]

[REDACTED] Many of these performance standards will delineate the response times for client services—answering telephone calls and providing assistance and information to clients—ensuring that all stakeholders receive timely and accurate information and assistance.

**Requirement:** Produce and make available upon request to clients information regarding new NANPA CO Code Administration processes, procedures, interfaces and services.



██████████ will publish and make available upon request information regarding new NANPA CO code administration processes, procedures, interfaces, and services. We will tell users how to obtain Industry Guidelines and other relevant information. Oftentimes, we will direct users to the NANPA Web Site or other web sites where they can download much of this type of information.

**Requirement: Provide upon request information on how to obtain current documents related to CO code administration by either referring them to Web sites where it will be possible to download electronic copies or provide paper copies if the requester cannot obtain the document via the internet.**

As the new NANPA, we will provide information on how to obtain current documents related to CO code administration by either referring them to the NANPA Web Site so they can download electronic copies or providing them actual paper copies. Sample of current documents include:

- Central Office Code (NXX) Assignment Guidelines
- NPA Code Relief Planning Guidelines
- Industry Notification of NPA Relief Activity Guidelines
- NPA Allocation Plan and Assignment Guidelines
- Recommended Notification Procedures to Industry for Changes in Access Network Architectures.



**Requirement: Provide assistance to users of numbering resources and suggest alternatives, when possible, that will optimize number resource utilization.**

Our CO code administrators will provide assistance to users of numbering resources and suggest alternatives, when possible, that will optimize number resource utilization. We will faithfully follow the assignment principles stated in Section 3.0 of the current INC Guidelines. We will operate according to strict internal procedures to maintain neutrality when offering assistance to users.

**Requirement: Maintain working knowledge of local dialing plans.**

Our CO code administrators will develop and maintain an understanding of local dialing plans so we can provide this information to code applicants to assist them in their code requests.

**Requirement: Assist Code Applicants in understanding and completing the Part 1 form contained in the CO Code (NXX) Assignment Guidelines.**

Our CO code administrators will assist code applicants in understanding and properly completing Part 1 of the CO Code Request Form to facilitate the CO assignment process and reduce the number of forms returned for improper or incomplete data.



**Requirement:** Respond to inquiries regarding available CO Codes.

Our CO code administrators will also respond to inquiries regarding available and unassigned CO codes, providing accurate and up-to-date information. Due to the latency of LERG publishing and multiple part form required to completely assign a CO code. There can be instances where a CO code is in the process of "assignment," but the appropriate systems (RDBS) have not been updated because certain entities may retain this operation instead of requesting that the NANPA perform this task as an enterprise service. As we transition CO code administration responsibilities, we will develop procedures to address and provide information regarding NXXs that are "in assignment."

### **5.2.2 Central Office Code Request Processing**

A major activity of [REDACTED] will be the actual reception, processing, and assignment of CO codes in accordance with industry guidelines, namely, INC 95-0407-008. Our CO code administrators will receive and process applications within the required time frames and properly notify code applicants and the industry. [REDACTED]

[REDACTED]



**Requirement: Receive and process applications for CO Codes in accordance with CO Code (NXX) Assignment Guidelines, INC 95-0407-008.**

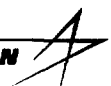
Our code administrators will receive Part 1 of the Code Request Forms, verify the accuracy and completeness of the form and process the form according to Sections 4.0, 5.0, and 6.0 of the CO Code (NXX) Assignment Guidelines.

**Requirement: Assign a central office code.**

After carefully checking the information contained on Part 1 of the Code Request Forms, our CO code administrators will properly assign a central office code.

**Requirement: Apply CO Code conservation practices in accordance with the CO Code (NXX) Assignment Guidelines.**

Whenever possible, our CO code administrators will apply conservation practices to conserve the use of CO codes in accordance with INC 95-0407-008 CO Code (NXX) Assignment Guidelines. For example, if mutually agreed by affected parties, an NXX could be shared when: 1) a single switching entity/POI provides access for multiple carriers, 2) the need for numbers by either carrier is less than a full code, and 3) certain provisions are satisfied as delineated in Section 4.3 of the INC Guidelines.



**Requirement:** Selects a CO Code that does not present dialing, routing or rating conflicts.

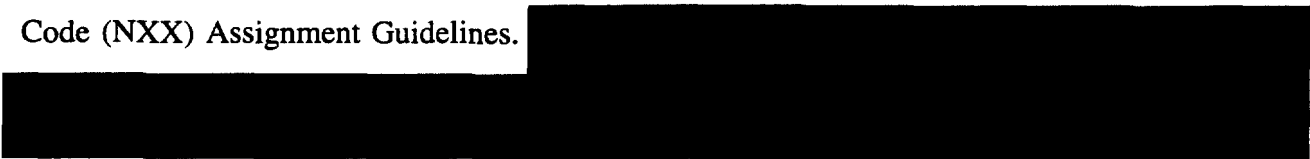
Our CO code administrators will select a CO code that does not present dialing, routing, or rating conflicts, and will notify applicants if a specific code presents these problems or has been “reserved” by regulators.

**Requirement:** Request and obtain local dialing plans and maintain this information for use in making CO code assignments.

During the transition period and working with local regulators and the current regional CO code administrators, we will obtain local dialing plans and maintain this information through the duration of the contract.

**Requirement:** Provide a response to CO Code applicants within the time frame specified in the CO Code (NXX) Assignment Guidelines

Our CO code administrators will provide responses to CO code applicants within ten (10) working days after receiving their application forms as specified in Section 5.0 of the INC CO Code (NXX) Assignment Guidelines.



**Requirement:** Verify that applicants place the codes in service within the time frames specified in the CO Code (NXX) Assignment Guidelines.

Our CO code administration will also actively monitor code use, per industry guidelines, to ensure that applicants place codes in service within six months after the initially published effective date. Per INC 95-0407-008, Section 6.3.3, Code Use, if codes are not in service after six (6) months, we will request that the CO code be returned for reassignment.

**Requirement:** Adapt assignment practices in accordance with changes to the CO Code (NXX) Assignment Guidelines and regulatory directives.

Finally, we will proactively and continuously refine our assignment practices in accordance with changes to the CO Code (NXX) Assignment Guidelines and regulatory directives.

### **5.2.3 Industry Notification Functions**

As the new NANPA, we will follow the required CO code assignment notification procedures per industry guidelines. As an enterprise service, [REDACTED]

[REDACTED] will enter rating and routing information into RDBS and BRIDS over dial-up lines. Otherwise, code applicants may make other arrangements to enter this data into RDBS and BRIDS so that the assignment of CO codes can be known to the industry through RDBS outputs such as the LERG.





**Requirement:** Follow the CO Code (NXX) Assignment Guidelines for notification of CO Code assignments which is currently performed by entering data directly into RDBS/BRIDS.

At the request and authorization of code applicants, we will enter rating and routing data into RDBS/BRIDS so the assignment of CO codes can be made known to the industry. It is important to note that, according to current industry guidelines, code applicants will have to designate the NANPA as having Administrative Operating Company Number (AOCN) responsibility for the data inputs in order for the NANPA to perform this task.

**Requirement:** Capability to input rating and routing data into the RDBS and BRIDS as a service to code holders that do not wish to perform these functions themselves.

Data communications facilities will be provided at the NANPA Primary Facility so NANPA staff can access, via dial-up, the RDBS and BRIDS systems for entering rating and routing data.



**Requirement:** Assist in the resolution of call completion problems in accordance with the CO Code (NXX) Assignment Guidelines.

Where appropriate and in accordance with industry guidelines, we will assist in the resolution of call completion problems.

#### **5.2.4 NPA Relief Planning**

NPA Relief Planning is arguably the most important task of the new NANPA. As the use of CO codes increases at an alarming rate causing ever increasing numbers of new NPAs, NPA splits, NPA Overlays, and boundary realignments, heightened scrutiny is being placed on the decisions made by the industry and regulators. Simply put, no one—residents, businesses, governments, and regulators—like changing phone numbers or having to dial extra digits to place a call to a location just around the corner. Thus, as the new NANPA, we understand that our job is to actively and continuously monitor CO code use, NPA fill rates and trends, and initially determine and escalate NPAs that are projected to exhaust. We will thoroughly analyze reliable alternatives and present our analysis and supporting data to the industry and regulators so decisions can be made. Specifically, we will perform high quality and effective NPA relief planning activities as described in the remainder of this section (5.2.4).

**Requirement:** Determine need for and identify timing of NPA Relief in accordance with CO Code (NXX) Assignment Guidelines and NPA Code Relief Planning Guidelines.



[REDACTED] will continuously monitor growth in CO codes, the growth rates within NPAs, and trends. After analyzing this data and in accordance with relief planning guidelines, our NPA relief planners will determine the need and timing for relief planning for NPAs that are near exhaust.

**Requirement: Promptly communicate with all affected industry members and appropriate regulatory bodies to advise them of the need for relief planning to occur.**

Through established channels and procedures, our NPA relief planners will communicate and notify the affected industry members and appropriate regulatory bodies of the need for relief planning to occur.

**Requirement: Prepare and distribute to industry members an Initial Planning Document (“IPD”) for each NPA projected to exhaust over the forecast period, as identified in the annual COCUS.**

[REDACTED] will prepare and distribute an IPD for each NPA that is projected to exhaust during the forecast period. This plan will provide the rationale for the projection and the projected time “window” of exhaust, as well as the initial descriptions of proposed relief methods.



**Requirement: Notify interested industry and regulatory parties and conduct Industry NPA Relief Meeting(s) to gain consensus of local industry and obtain endorsement of regulatory authorities on the relief plan and relief date (check NPA Relief Planning Guidelines).**

For all relief planning meetings, we will notify interested industry and regulatory parties in a timely and effective fashion using technologies, such as broadcast faxes, e-mail, and the NANPA Web Site to publish meeting date, and times. Our objective will be to solicit and get as many parties to the meetings as possible to gain consensus of local industry committees and organizations and obtain endorsement from the appropriate regulatory authorities on proposed relief plans, methods, and effective relief dates.

**Requirement: Perform the role of moderator for all relief planning meetings.**

We will actively moderate all relief planning meetings in an orderly and fair manner.

**Requirement: Identify possible NPA relief options and methods.**

Our NPA relief planners will identify the possible NPA relief options and methods for NPAs near exhaust.



**Requirement: List and qualify the impacts of each NPA relief option in order to determine the advantages and disadvantages of the alternatives.**

For each NPA relief option, we will list and objectively qualify the advantages and disadvantages of the alternatives in a fair, evenhanded, and impartial manner so the industry and appropriate regulatory groups can discuss the alternatives and work toward consensus.

**Requirement: Submit to the appropriate regulatory body the results of the industry effort regarding NPA relief planning when consensus is reached or when consensus cannot be reached in the time frame established for reaching industry consensus.**

Within the established time frames, we will submit to the appropriate regulatory body the results of the industry's efforts regarding NPA relief planning when consensus, or a lack thereof, is reached.

**Requirement: Provide testimony as necessary.**

As the new NANPA, we will provide testimony on our efforts as necessary.

**Requirement: Assign a new NPA code(s) in accordance with the approved relief plan.**



In accordance with the approved relief plan, we will assign new NPA code(s) to begin relief activities.

**Requirement: Provide industry notification of NPA code relief activities as per Industry Notification of NPA Relief Activity Guidelines.**

Per ICCF 92-1127-006 Industry Notification of NPA Relief Activity Guidelines, we will perform the required industry notification procedures within the specified time frames, including the arrangements for updating the required systems—TRA, RDBS, LASS, and BRADS. In addition, we will meticulously follow the “Checklist for the NPA Code Relief Coordinators” located at the end of the ICCF 92-1127-006 guidelines.

**Requirement: Prepare and issue a press release to inform the public of the industry/regulator approved Relief Plan and respond to requests from the media and public for information.**

Per Item 3 of the ICCF 92-1127-006 Industry Notification of NPA Relief Activity Guidelines, we will inform the public of the industry/regulator approved relief plan. In addition, we will respond to all information requests made by the public and the media.



**Requirement:** Assist NPA Relief implementation teams as necessary and assist the Number Administration Service Center (“NASC”) in modifications to the 800/888 database.

Our NPA relief planners will assist NPA relief implementation as necessary as well as the SMS/800 Help Desk, formerly known as the 800 NASC. [REDACTED]

[REDACTED]

### **5.2.5 Jeopardy NPA Processes**

Lockheed Martin understands the importance of processing Jeopardy NPAs and that this critical task must be performed with precision and managed properly. Through accurate information and solid trend and growth analysis, we will be able to forecast when NPAs are projected to exhaust—“when the forecast and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief as defined in INC 95-0407-008.” As conditions warrant and escalate, we will also implement NPA-specific jeopardy and extraordinary conversation procedures per Sections 8.3, 8.4, 8.5, and 8.6 of INC 95-0407-008. Specifically, we will process NPAs in jeopardy as described in the remainder of this section (5.2.5).

**Requirement:** Determine if and when to declare a Jeopardy NPA condition.



Through careful and painstaking analysis of CO code (NXX) assignment rates, trends, and historical growth rates, we will determine if and when to declare a Jeopardy NPA condition in accordance with Industry Guidelines.

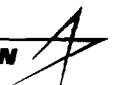
**Requirement: Upon the identification of a jeopardy situation, notify appropriate regulatory authorities and affected parties within the NPA.**

After determining that a NPA is in jeopardy, we will notify the appropriate regulatory authorities and affected parties of such an occurrence and that special conservation will be invoked per Section 8.4 of INC 95-0407-008.

**Requirement: Invoke special conservation procedures including the establishment of a code relief date.**

After notifying the appropriate regulatory authorities and affected parties, we will invoke special conservation procedures delineated in Section 8.4 of INC 95-0407-008. We will also establish the code relief date.

**Requirement: Call and conducts Jeopardy NPA Industry Meetings.**





We will invite affected parties and convene jeopardy NPA meetings to explain the special conservation measures that will be in effect until code relief is implemented and begin discussions concerning any extraordinary conservation procedures that may be employed.

**Requirement: Collects and compile Jeopardy COCUS forms in Jeopardy NPAs.**

After declaring a jeopardy NPA and invoking special conservation procedures, our NPA Relief Planners will collect and compile “Jeopardy COCUS” forms submitted by CO Code holders.

**Requirement: Implements Extraordinary NPA-specific Conservation Measures.**

If, after implementing special conservation procedures, adequate relief is not provided, we will invoke extraordinary NPA-specific conservation measures per Sections 8.5 and 8.6 of INC 95-0407-008.

### **5.3 Central Office Code Transition**

Given the enormous responsibilities associated with administering CO codes and NPA relief planning, transition of such activities must be organized, smooth, thoughtfully planned, and well managed. Clearly, NANC recognizes this fact because ample, but necessary, time (18 months) has been given for the complete transition of CO code administration functions from the current regionalized code administrators to the new NANPA. The remainder of this section provides an

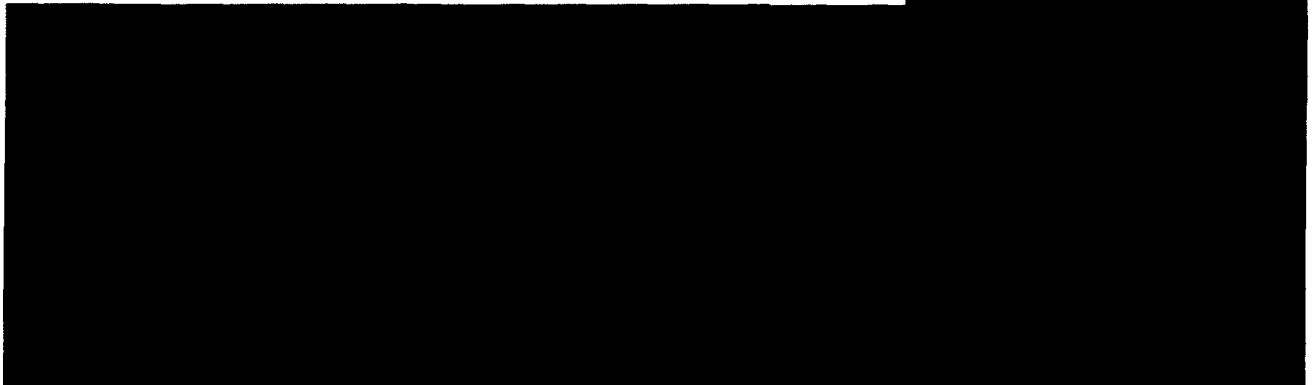


overview of Lockheed Martin's initial thoughts concerning the transition of this critical functions, including a general description of our approach to incorporate current CO code administration functions within our NANPA organization.

**Requirement:** Provide a written description of how it will incorporate the CO code administration functions described above into its organization.



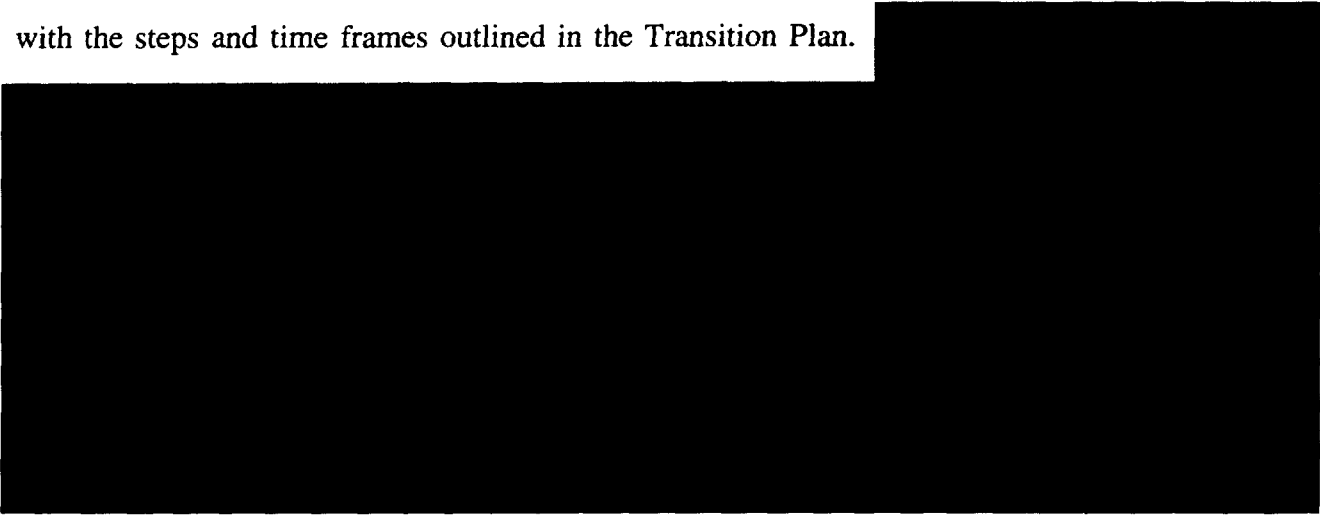
Exhibit 5-1 shows our proposed overall NANPA organization.



***Confidential Information Deleted***



After successfully transitioning NANPA duties, we will begin to transition CO code administration functions from the existing regionalized CO code administrators in accordance with the steps and time frames outlined in the Transition Plan.



**Requirement: Develop a draft Transition Plan jointly with the NANC CO Code Transition Task Force within 60 days after selection**

In conjunction with the NANC CO Code Transition Task Force, we will develop a comprehensive draft Transition Plan within 60 days after selection and, subject to NANC changes, we will submit a final Transition Plan within 90 days after selection. This plan will include detailed steps and time frames for transitioning CO Code Administration functions from the existing regional code administrators. To develop this plan, we will interface with the existing code administrators to formulate specific time frames for transitioning CO code administration duties in their area.

### **5.3.1 Basic Planning Information**

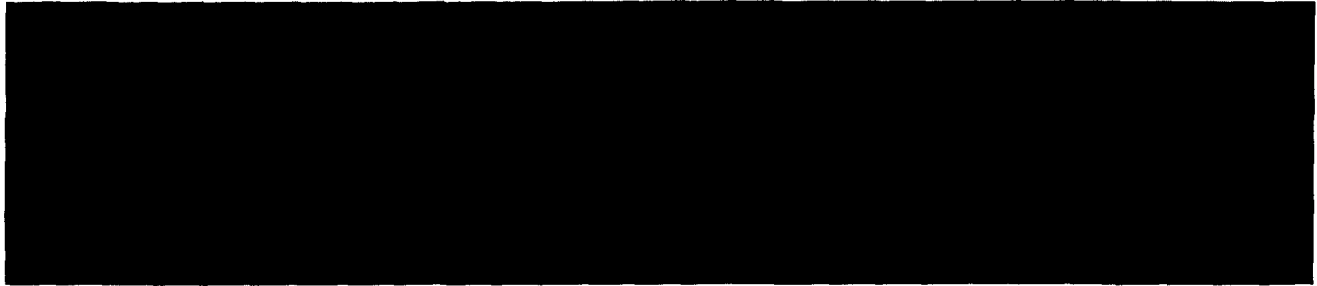
**Requirement:** Describe 1) staffing and cross-training requirements; 2) transition and hand-off schedules; 3) methods which would be used to address various local aspects and requirements for CO code assignments, such as tracking of cross-boundary local calling requirements, identification of local calling areas and knowledge of specific local and toll dialing plans within the states; 4) how CO code administration costs during the transition period were allocated.

#### **Overall Transition Objective**

Our overall transition objective is to perform transition activities in a well planned and managed fashion, so existing CO code Administration functions and NPA relief planning are not disrupted or adversely impacted. Our Transition Plan will detail the exact transition steps, when they should start, when they should be completed, and how to determine when a step has been successfully performed.

#### **Staffing and Cross-training**

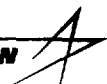


**Transition Schedules**

We understand that Lockheed Martin has 18 months to transition CO code administration activities from approximately 12 different entities, yielding an average time interval of one and a half months per transition. Once the first two or three areas have been transitioned, subsequent areas can be completed much faster. We will work with NANC to formulate the final transition schedule as a part of our jointly-developed Transition Plan.

**Methods to Address Local Considerations**

To address local considerations, especially in the areas of NPA relief planning, we will acquire the required information from the existing CO code administrators as itemized in our response to Section 5.3.2 below. This information will include cross-boundary local calling requirements, identification of local calling areas, local and toll dialing plans, and historical NPA growth. Using the information and developing relationships with regulatory agencies, we will develop an understanding of the local environment so that we can effectively assign new CO codes and perform NPA relief planning efforts.



**Allocation of CO Code Administration Costs During Transition**

Our prices presented in Section 10.0 are inclusive of transition costs only for work performed. We understand that until all areas are transitioned, allocation of CO code administration costs must be determined. We propose to work with and at the direction of NANC to properly allocate CO code administration costs.

**5.3.2 Coordination with Existing CO Code Administrators**

**Requirement:** Demonstrate its ability and describe the process to be used for coordination with existing CO code administrators within the U.S. and its territories for the transfer of supporting information.

Lockheed Martin has a heritage of successfully transitioning projects from state and local government agencies as well as private contractors, [REDACTED]

[REDACTED] Because of our experience, we understand that developing good and solid relationships with the previous contractor or entity is mandatory, although, this task is often difficult. In order to properly perform CO code administration and NPA relief planning activities, a tremendous amount of historical data and information must be transferred from the current administrators. This data is necessary to gain an understanding of local dialing plans and to accurately project growth rates and trend analysis for NPA relief planning. Also, historical data that shows prior NPA relief planning efforts is invaluable in recommending future NPA relief plans.



As we transition CO code administration activities on an area-by-area basis, we will develop and refine a "Checklist of Information" that must be transferred. Our initial checklist includes the following supporting documentation and information:

- Copies of all CO code requests received after the start of transition
- Non-proprietary assignment status information for all CO codes in all NPAs
- Historical summaries of assigned CO code quantities for the last five years
- Historical COCUS input data, since January 1, 1992 at a minimum
- Detailed information pertaining to local calling areas
- Detailed information regarding specific assignment limitations such as those resulting from cross-boundary local calling, network capabilities, etc.
- Contact lists of key personnel involved with the resolution of routing problems
- Most recent area code exhaust projections and methodologies used to project exhaust
- Complete mailing lists of industry members affected by ongoing area code relief projects
- Copies of all industry meeting minutes, regulatory filings, and non-proprietary planning data relating to ongoing area code relief projects.





## 6.0 DISPUTE RESOLUTION

### HIGHLIGHTS

- Through meticulous tracking and detailed procedures to ensure that all disputes are quickly recorded, addressed, researched, and resolved
- Proven internal dispute processes and trouble tracking system guide disputes through capture to closure

### Overview

*All disputes will be addressed in a timely, fair, and impartial manner, guaranteeing expeditious resolution and escalation to the proper governing bodies.*

Lockheed Martin understands that, in our role as the NANPA and Billing and Collection Agent, a variety of disputes will have to be resolved. We know that disputes could arise out of our performance, our billing and collection operations, from industry forum activities, from conflicting government or regulatory directives, from the NANC, or from regulatory authorities of NANP member countries. Indeed, disputes could come from a variety of avenues, and solid procedures must be in place to address and close them quickly.

